

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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October 7, 2008

Mr. Ian Robb
Chevron Environmental Management
6001 Bollinger Canyon Rd K2256
PO Box 6012
San Ramon, CA 94583-2324

Subject: Fuel Leak Case No. RO0000195 (Global ID # T0600100307), Chevron #9-0290, 1802 Webster Street, Alameda, CA

Dear Mr. Robb:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site and the document entitled "Down-gradient Hydrocarbon Plume Investigation Report," received April 18, 2007 and prepared by Conestoga Rovers Associates (CRA). Results from the subsurface investigation indicate that residual dissolved phase petroleum hydrocarbon contamination was detected in groundwater down gradient of your site at concentrations of up to 5,400 µg/L TPHd in soil boring SB-17 and 3,200 µg/L TPHd in soil boring SB-18. In addition, the work plan approval letter from ACEH (dated July 22, 2005) requested that you propose interim remediation to reduce the high concentrations of MtBE beneath your site and that you install soil borings between your site and the BP service station located at 1716 Webster Street, Alameda to assess if MtBE from the upgradient BP station is impacting your site.

In their May 2005 work plan, CRA proposed the installation of one monitoring well following the completion of the downgradient investigation. To date we have not received any information regarding the proposed monitoring well installation or well location. Furthermore, we have not received a response to our request for interim remediation of MtBE or a response to our request for the installation of soil borings between your site and the BP site.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to [mail to: steven.plunkett@acgov.org](mailto:mail:steven.plunkett@acgov.org)) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Subsurface Investigation Results.** CRA states that the soil borings (SB-17 and SB-18) installed across Webster Street lack MtBE and BTEX constituents that would be present if the contamination detected in the downgradient soil borings was from an onsite source. ACEH disagrees with CRA's conclusion that due to the lack of BTEX and MtBE detected in soil borings SB-17 and SB-18 the contamination identified in the downgradient soil borings is from an offsite source. Our evaluation of water quality data indicate that BTEX constituents have not been present in onsite monitoring wells B-5, B-11 or B-12 since approximately 2001. As a result, it is unlikely that BTEX would be present in downgradient soil borings SB-17 and SB-18. Furthermore, our review of MtBE data for monitoring wells B-11 and B-5 indicate that MtBE is currently present in well B-11 (38,000 µg/L) and in downgradient well B-5 (97 µg/L). The linear separation between B-11 and B-5 is

approximately 20 feet, and it has yet to be determined what may be causing the decrease in concentration to occur between these two wells. Furthermore, given the decrease in concentration that is occurring between onsite wells B-11 and B-5 it is unlikely that MtBE would be detected in soil borings that are approximately 160 feet downgradient of the site.

2. **Utility Corridor Evaluation.** CRA proposed the installation of two soil borings to evaluate the utility corridor(s) adjacent to your site. However, these borings were not installed due to the proximity of high voltage underground lines. Instead of sampling the utility corridor, CRA collected a water sample from the utility vault. MtBE was not detected during water sampling in the utility vault, but because the utility vault sampling was conducted in December it is more likely that water in the utility vault is surface water runoff rather than groundwater, as CRA concludes. Although MtBE was not detected in the electrical utility vault it is possible that other utilities may be acting as a pathway for MtBE contamination migration. Therefore, we request that you evaluate the other utilities previously identified and present the results from your evaluation in the report requested below.
3. **Site Conceptual Model.** In October 2000, Delta submitted a site conceptual model that identified hydrocarbon volatilization into the vadoze zone as a potential human health risk. Subsequently, Delta proposed conducting a risk assessment to evaluate the potential human health risks associated with soil and groundwater contamination beneath your site. However, no discussion or recommendations regarding the evaluation of the potential risk associated with contamination in the vadoze zone or the vapor intrusion/migration pathway was presented. ACEH agrees that a risk assessment would be useful for the evaluation of potential human health risks. However, prior to performing the proposed risk assessment, ACEH requests that you prepare a work plan to evaluate the potential risk associated with soil vapor and the vapor intrusion pathway. Please submit the work plan according to the schedule outlined below. Once the investigation has been completed we request that you update your site conceptual model to reflect all activities completed after 2000.
4. **Potential Upgradient MtBE Contamination Source.** It appears that MtBE contamination from the BP service station located at 1716 Webster Street, Alameda (ACEH ID #RO0000192, Geotracker ID #T0600100307) may be impacting your site. Water quality data collected in 2001, from up gradient monitoring well B-6 detected high levels of MtBE at concentrations of up to 34,000 µg/L. In a directive letter dated July 22, 2005 ACEH requested that in order to confirm if MtBE contamination detected in upgradient well B-6 originated from the BP station additional soil borings must be installed. To date, we have not received confirmation that the soil borings have been installed. We request that you prepare a work plan that details your proposal to install soil borings between your site and the BP site to evaluate if contamination from an upgradient source is contributing to the MtBE plume beneath your site. Please submit the work plan according to the schedule below.
5. **Interim Remedial Action.** In correspondence dated July 22, 2005, ACEH requested that you propose interim remediation to remove MtBE contamination from beneath your site. As yet, we have not received any proposal for interim remediation of MtBE contamination. We request that you prepare an interim remedial action plan to address contamination in the area near well B-11. Please submit the interim remediation work plan according to the schedule below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- **January 21, 2009** – Work Plan with Utility Corridor Evaluation
- **March 1, 2009** – Interim Remediation Work Plan

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for

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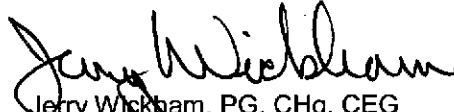
possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 383-1761 or send me an electronic mail message at steven.plunkett@acgov.org.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist



Jerry Wickham, PG, CHg, CEG
Senior Hazardous Materials Specialist

cc: Laura Genin
CRA
5900 Hollis Street, Suite A
Emeryville, CA 94608

Donna Drogos, ACEH, Steven Plunkett ACEH, File